

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:	X	
	:	
	:	
THE FINANCIAL OVERSIGHT AND	:	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	:	Title III
	:	
as representative of	:	Case No. 17-BK-3283 (LTS)
	:	
THE COMMONWEALTH OF PUERTO RICO <i>et al.</i> ,	:	(Jointly Administered)
	:	
Debtors. <sup>1</sup>	:	
	X	

**INFORMATIVE MOTION OF OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS REGARDING JANUARY 29-30, 2020 HEARING**

To the Honorable United States District Judge Laura Taylor Swain:

The Official Committee of Unsecured Creditors of all Title III Debtors (the “Committee”)<sup>2</sup> hereby submits this informative motion in response to the Court’s *Order Regarding Procedures for Attendance, Participation and Observation of January 29-30, 2020 Hearing* [Case No. 17-3283, Docket No. 10254] (the “Scheduling Order”) and respectfully states as follows:

1. Luc A. Despins and G. Alexander Bongartz of Paul Hastings LLP will appear in person on behalf of the Committee at the Hearing (as defined in the Scheduling Order) in

---

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> The Committee is the official committee of unsecured creditors for all Title III Debtors, other than PBA and COFINA.

Courtroom 3 of the United States District Court for the District of Puerto Rico, 150 Carlos Chardón Street, Federal Building, San Juan, Puerto Rico, and address, as necessary, the following matters:

- (a) *Amended Motion for Entry of an Order (A) Authorizing Alternative Dispute Resolution Procedures, (B) Approving Additional Forms of Notice, and (C) Granting Related Relief* [Docket No. 9718];
  - (i) *Limited Response of Official Committee of Unsecured Creditors to Debtors' Amended Motion for Entry of an Order (A) Authorizing Alternative Dispute Resolution Procedures, (B) Approving Additional Forms of Notice, and (C) Granting Related Relief* [Docket No. 10146];
- (b) *Interim Case Management Order for Revenue Bonds* [Docket No. 9620];
  - (i) *Limited Response of Official Committee of Unsecured Creditors to Interim Case Management Order For Revenue Bonds* [Docket No. 10249];
- (c) *Cobra Acquisitions LLC's Motion for Allowance and Payment of Administrative Expense Claims* [Docket No. 8789];
  - (i) *Joint Urgent Motion of the Oversight Board, PREPA, and AAFAF to Extend All Applicable Deadlines to Cobra Acquisition LLC'S Motion for Allowance and Payment of Administrative Expense Claims* [Docket No. 8838];
  - (ii) *Joinder of Official Committee of Unsecured Creditors in Joint Urgent Motion of the Oversight Board, PREPA, and AAFAF to Extend All Applicable Deadlines to Cobra Acquisition LLC's Motion for Allowance and Payment of Administrative Expense Claims* [Docket No. 8840];

- (d) *Motion for Relief from the Automatic Stay Pursuant to PROMESA's Sections 4, 7, 301(c)(3), 304(h), Department of Health and Human Services Administrative Order ACYF-CB-PI-18-03, Child Abuse Prevention and Treatment Act (CAPTA), Bankruptcy Code's Sections 362(b)(4), (D)(1)* [Docket No. 9677];
- (i) *Limited Response of Official Committee of Unsecured Creditors To Motions For Relief From Automatic Stay Filed By FDR 1,500 Corp., S.E. [Docket No. 9664] and Centro De Orientación Y Ayuda Psiquiátrica, Inc. [Docket No. 9677] [Docket No. 9832];*
- (e) Any objections, responses, statements, joinders, or replies to any of the foregoing pleading; and
- (f) Any statements made by any party in connection with the Title III cases or any adversary proceeding pending therein.

2. In addition, Mr. Juan J. Casillas Ayala of Casillas, Santiago & Torres LLC and one of his co-counsel will also be attending, on behalf of the Committee, the Hearing in San Juan, Puerto Rico.

*[Remainder of page intentionally left blank.]*

WHEREFORE, the Committee respectfully requests that the Court take notice of the above.

Dated: January 24, 2020

/s/ Luc A. Despins

PAUL HASTINGS LLP  
Luc. A. Despins, Esq. (Pro Hac Vice)  
James R. Bliss, Esq. (Pro Hac Vice)  
Nicholas A. Bassett, Esq. (Pro Hac Vice)  
G. Alexander Bongartz, Esq. (Pro Hac Vice)  
200 Park Avenue  
New York, New York 10166  
Telephone: (212) 318-6000  
lucdespins@paulhastings.com  
jamesbliss@paulhastings.com  
nicholasbassett@paulhastings.com  
alexbongartz@paulhastings.com

*Counsel to the Official Committee of Unsecured Creditors*

- and -

/s/ Juan J. Casillas Ayala

CASILLAS, SANTIAGO & TORRES LLC  
Juan J. Casillas Ayala, Esq. (USDC - PR 218312)  
Israel Fernández Rodríguez, Esq. (USDC - PR 225004)  
Juan C. Nieves González, Esq. (USDC - PR 231707)  
Cristina B. Fernández Niggemann, Esq. (USDC - PR 306008)  
PO Box 195075  
San Juan, PR 00919-5075  
Tel.: (787) 523-3434 Fax: (787) 523-3433  
jcasillas@cstlawpr.com  
ifernandez@cstlawpr.com  
jnieves@cstlawpr.com  
cfernandez@cstlawpr.com

*Local Counsel to the Official Committee of Unsecured Creditors*